

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
Civil Action No. 5:15-cv-419-D

MARIAN SNOW,

Plaintiff,

vs.

CLIENT SERVICES, INC.,

Defendant.

MOTION FOR EXTENSION OF
TIME TO RESPOND TO
COMPLAINT

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, Defendant Client Services, Inc. (“Client Services”), by and through the undersigned counsel, respectfully moves the Court for an Order extending the time within which Client Services may respond to the Complaint filed in this action. In support of this motion, Client Services shows the Court the following:

1. Plaintiff filed this action pro se in this Court on August 24, 2015.
2. Client Services’ registered agent received a copy of the Summons and Complaint on September 29, 2015.
3. Client Services presently has until October 20, 2015, to serve a response to the Complaint.
4. Client Services has not previously requested any extension of time of the deadline to respond to the Complaint, and the time to file a response to the Complaint has not yet expired.
5. Client Services needs additional time to investigate and respond to the allegations of the Complaint.
6. Accordingly, there is good cause to extend the time within which Client Services may serve a response to the Complaint, to and including November 10, 2015.

7. Plaintiff is unrepresented by counsel in this matter. Consequently, Client Services has been unable to consult with any counsel regarding this request for an extension of time.

WHEREFORE, Defendant Client Services, respectfully requests that the Court order that the time within which Client Services may serve a response to the Complaint be extended, to and including November 10, 2015.

This the 20th day of October, 2015.

By: s/ Julia B. Hartley
Donald R. Pocock
NC State Bar No. 29393
Julia B. Hartley
NC State Bar No. 35188

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Attorneys for Client Services, Inc.

Certificate of Service

The undersigned hereby certifies that a copy of the foregoing Motion was duly served when the same was deposited into the United States Mail, first-class postage prepaid, addressed as follows:

Marian Snow
907 Timberlake Dr. NW
Wilson, NC 27893

This the 20th day of October, 2015.

By: s/ Julia B. Hartley
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